



July 28, 2006

Fax Transmission  
(202) 720-8871  
[FPB.DocketClerk@usda.gov](mailto:FPB.DocketClerk@usda.gov)

Cheri L. Emery  
Cheri.Emery@usda.gov  
Fresh Products Branch  
Fruit & Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Room 1661 South Building, Stop 0240  
Washington, DC 20250-0240

Dear Ms. Emery:

Re: United States Standards for Grades of Greenhouse Tomatoes  
Docket # FV-04-301, Fed. Reg. 5/31/06, page 30860

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining the need for changes to the U.S. Grade Standard for Greenhouse Tomatoes. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. Those members responding were in full support of the proposed change to allow that percentages of defects and size classifications be determined by count rather than weight. This change would bring the standard for greenhouse tomatoes more in line with the U.S. Standard for Grades of Fresh Tomatoes. In fact, our members would be in favor of carrying this further by incorporating greenhouse tomatoes into the U.S. Standard for Grades of Fresh Tomatoes.

We recognize, however, that the current proposal is limited to changes dealing only with the U.S. Standard for Grades of Greenhouse Tomatoes and that any changes to the U.S. Standard for Grades of Fresh Tomatoes would have to occur at another time. We, therefore, recommend that the language in the U.S. Standard for Grades of

Greenhouse Tomatoes be revised to read exactly as the U.S. Standard for Grades of Fresh Tomatoes.

Our members strongly support the proposal to add moldy stems as a damage defect in the requirements for U.S. No. 1. In fact, they would like to see this incorporated into the U.S. Standard for Grades of Fresh Tomatoes as well.

In addition, cartons of imported greenhouse tomatoes (particularly from Europe) currently list weights/sizes in metric on the outside of the carton. This causes numerous administrative problems in trying to convert to English measurements. It would be extremely helpful if these cartons would list the contents in both metric and English (inches/pounds) measurements.

I hope these insights are helpful and please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick A. Davis".

Patrick A. Davis  
President